

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

Cabanillas & Associates, PC
Paola D. Vera, Esq.
120 Bloomingdale Rd., Suite 400
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914-385-0292

In Re:

Case No.: 20-18560

Miguel A. Perez-Fleitas

Debtor(s).

Hearing Date: 12/9/2020

Chapter: 13

Judge: Hon. SLM

**DEBTOR'S OPPOSITION TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(d)**

The above named debtor, by and through his attorney of record, Paola D. Vera, Esq. of Cabanillas & Associates, P.C., hereby opposes Homebridge Motion for Relief from the automatic Stay, and in support thereof presents the Certification of Paola D. Vera, Esq. and shows unto the Court the following:

1. On July 15, 2020 the debtor filed a voluntary Chapter 13 petition with the clerk of this court.
2. On October 28, 2020, Homebridge, filed a motion seeking relief from the automatic stay in regards to 1125 Monmouth Ave., Linden, New Jersey.
3. As of October 28, 2020 Debtor is delinquent a total of \$6,261.42.
4. On November 9, 2020 Debtor made a payment in the amount of \$2,087.14 via Cashier's check ending in 8935.

5. The Debtor would like the opportunity of paying the remaining balance owed to secured creditor in a six month cure to be paid directly to secured creditor along with the regular monthly mortgage payments commencing in December 2020.

6. The Debtor is willing to enter into a consent order to cure all post-petition arrears.

7. Therefore the Debtor respectfully requests that he be given the opportunity to cure all post-petition arrears.

WHEREFORE, the debtor respectfully request that the instant Motion be denied; and the debtor be granted such other and further relief as this Court deems proper.

Dated: Union City, New Jersey
November 23, 2020

CABANILLAS & ASSOCIATES, PC

/s/Paola D. Vera
Paola D. Vera, Esq.
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